



# **Finding Cost-Effective Greenhouse Gas Reductions (2030)**

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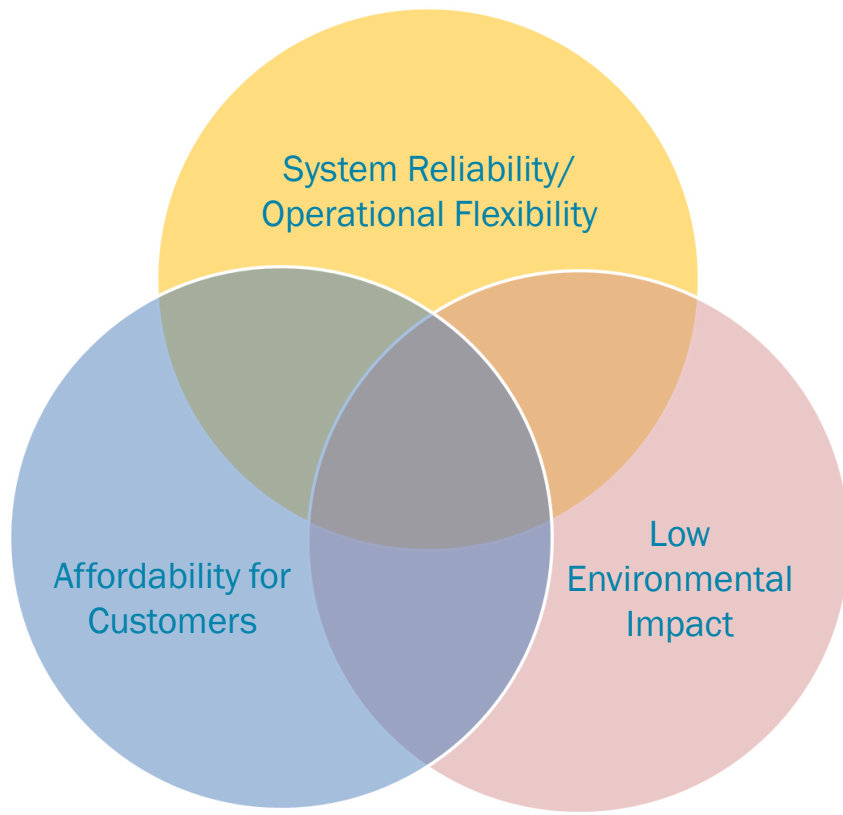
# Agenda

- Use of the Carbon Metric framework to prioritize GHG reducing initiatives
- Linking with other jurisdictions- Need for partnerships
- CHP and GHG reductions
- Cost Containment



## PG&E and AB 32

*PG&E supports energy policy that ensures a cost-effective, reliable source of energy to our customers and helps reduce greenhouse gases statewide*



- ✓ We support AB 32 and believe it can be achieved cost-effectively
- ✓ We are actively implementing all applicable AB 32 measures
- ✓ Californians will be best served by a broad mix of cost-effective clean energy policies
- ✓ We favor using rigorous and transparent cross-sectoral analysis to evaluate clean energy policies



# Carbon Metric Framework

- Encourage the use of a standardized analytical framework to evaluate cost-effectiveness across all greenhouse gas (GHG) abatement activities
- “Status-check” on 2020 abatement estimates of major AB 32 measures
- Provide a tool for planning of post-2020 GHG policies
- Promote a constructive dialogue about sensible and affordable clean energy policy

## Key Metric

$$\text{Cost of Emission Reductions (\$/Metric Ton)} = \frac{\text{Net Costs (NPV)}}{\text{GHG Emissions Abated (NPV)}}$$

Where: **Net Costs** = Measure Cost Less Avoided Cost

**GHG Emissions Abated** = Measure Quantity \* (Avoided Emissions Intensity Less Program Measure Emissions Intensity)



# Costs & Benefits Included/Excluded in the Initial “Total Resource Cost” Carbon Metric Evaluation

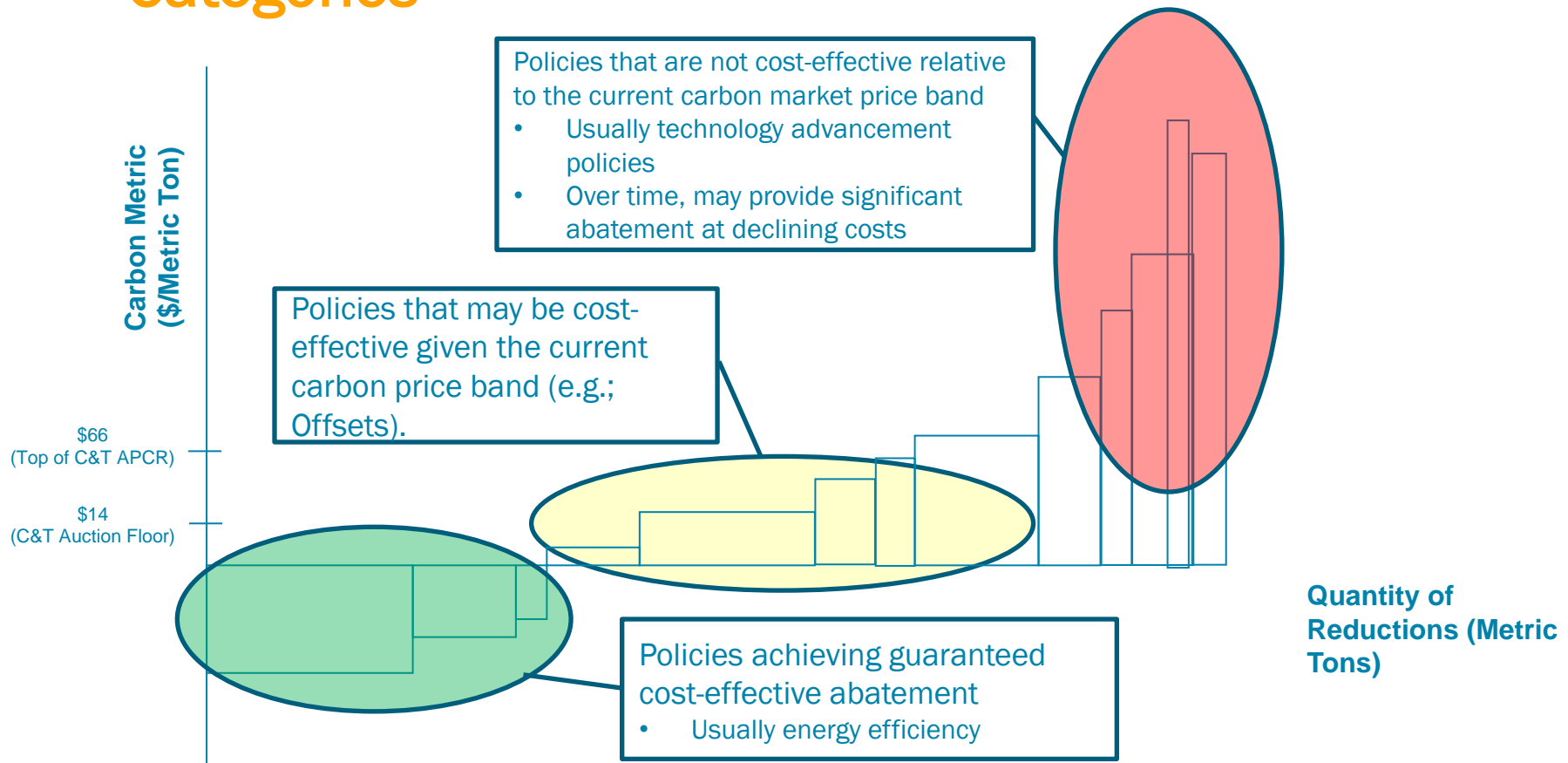
	Benefits	Costs
Benefits/Costs - Included	Monetized Benefits <ul style="list-style-type: none"><li>Energy Savings</li><li>Transportation Savings</li></ul>	Total Product/Project Costs (All Funding Sources) <ul style="list-style-type: none"><li>Capital</li><li>Operating</li></ul>
Benefits/Costs - Excluded	<ul style="list-style-type: none"><li>Health Benefits</li><li>Equity Benefits</li><li>Jobs Created</li><li>Macroeconomic Benefits</li><li>Local Benefits</li><li>National Security Benefits</li><li>Land Use Benefits</li><li>Fuel Diversity Benefits</li></ul>	<ul style="list-style-type: none"><li>Health Impacts</li><li>Equity “Costs”</li><li>Jobs Lost</li><li>Macroeconomic Costs</li><li>Local Costs</li><li>Land Use Opportunity Costs</li><li>Fuel Diversity Costs</li></ul>
	Carbon Reduced or Avoided	Carbon Created
Emissions Included	Emissions Reduced <ul style="list-style-type: none"><li>Avoided Based on Relevant Marginal Fuel and Carbon Intensity</li></ul>	Emissions Created (when applicable)
Emissions Excluded	Emissions avoided from upstream operations (e.g., project construction emissions)	Non-operating emissions (Construction, Fuel Transport, etc.)

- The Carbon Metric takes the CEC/CPUC’s “total resource cost” approach and adapts it for use with greenhouse gas abatement measures
- It is clear which costs and benefits are included in the metric and which are excluded
- Assumptions and calculations are transparent
- The CEC/CPUC “societal cost” framework is recommended as a second screen applied only to measures with high TRC values

\* For the transportation sector, analysis is completed on both a well-to-wheel (WTW) and a tank-to-wheels (TTW) basis



# Cost Curve Depiction of Carbon Metric Policy Categories



***The Carbon Metric framework facilitates comparison between abatement actions and the cap-and-trade carbon price to define three cost-effectiveness categories***



# Proposed Use of the Carbon Metric Framework

When planning future greenhouse gas abatement policies, the carbon metric can be used to sort proposals into three groups:

If The Carbon Metric is:	Cost-effectiveness Category	Proposed Action
1. Less than the 2020 Auction Floor Price (~\$14/MT)	<ul style="list-style-type: none"> <li>Always cost-effective</li> </ul>	<ul style="list-style-type: none"> <li>Prioritize implementation</li> <li>Unlock abatement potential otherwise untapped by the carbon price signal</li> <li>Identify and address any barriers to adoption</li> </ul>
2. Between the 2020 Auction Floor Price and the Top 2020 Price of the Allowance Price Containment Reserve (APCR)	<ul style="list-style-type: none"> <li>May be cost-effective today, depending on carbon price</li> </ul>	<ul style="list-style-type: none"> <li>Should be prioritized after measures in Group 1</li> <li>Explore likelihood of cap-and-trade price signal driving reductions in this category</li> </ul>
3. Above the Top of the 2020 APCR (~\$66/MT)	<ul style="list-style-type: none"> <li>Unlikely to be cost-effective under expected near-term carbon prices</li> </ul>	<ul style="list-style-type: none"> <li>Ensure actions are focused on achieving market transformation and reducing costs for long-term carbon reductions</li> <li>Evaluate if societal benefits outweigh societal costs</li> <li>Devote extra efforts to cost reduction</li> <li>Employ funding sources other than utility customer rates</li> </ul>

Carbon prices in this table are values in 2020 presented in 2010 dollars



## Linking with Other Jurisdictions- Need for Partnerships

- Achieving post-2020 targets without contributions from a broad coalition of jurisdictions will be more challenging and costly for California
- Renewed attention should be placed on working with the federal government, other states, and other governmental entities to set a plan to achieve post-2020 goals
- Broader linkage will promote innovation, build relationships, increase market size, reduce costs, and yield greater reductions globally
- Attracting and guiding private investment toward the development of low carbon technologies will provide momentum to meet post-2020 goals at a lower cost to California
- Increased opportunities for offset projects, with fewer, not greater, geographic limitations are needed to support cost containment.

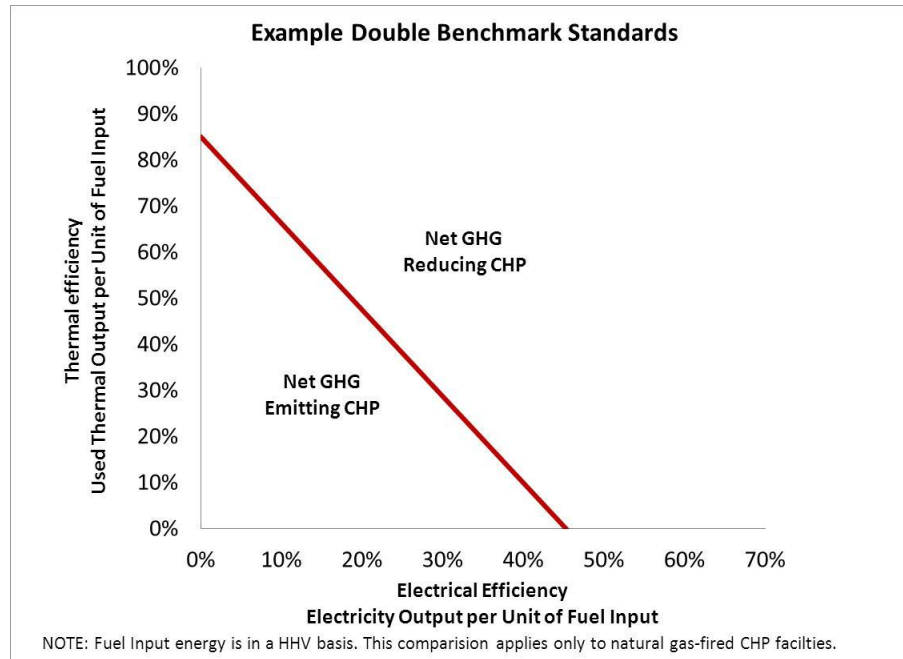




# Sustained Net Emissions Reductions Must be a Priority

Policy support for technologies that can offer only limited near-term reductions—such as topping-cycle combined heat and power (CHP)—should be reevaluated

## Comparing CHP to Separate Heat and Power (SHP)



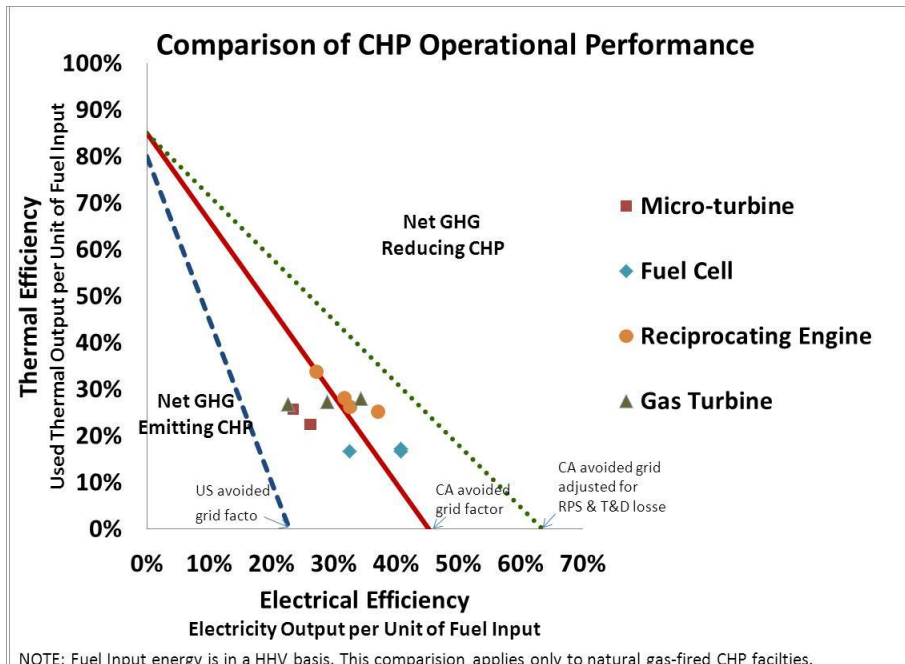
## What is the Double Benchmark?

- Answers the question: Is the topping cycle CHP facility reducing GHGs?



# Sustained Net Emissions Reductions Must be a Priority

A framework to properly evaluate the GHG performance of CHP systems



- Line represents - Separate heat and power double benchmark
- Dot represents - Electrical and thermal efficiency of example CHP technology type
  - Design performance: Based on 2012 ICF CHP potential study
  - Operational performance: Adjusted key performance drivers based on the review of public studies (such as SGIP impact evaluation reports)

## Performance of example CHP technologies relative to Double Benchmarks

Relative to US SHP Double Benchmark	Net GHG Reducing
Relative to CA SHP Benchmark I	Mixed
Relative to CA SHP Benchmark II	Net GHG Emitting

Conventional CHP have limited GHG emissions reduction potential in California

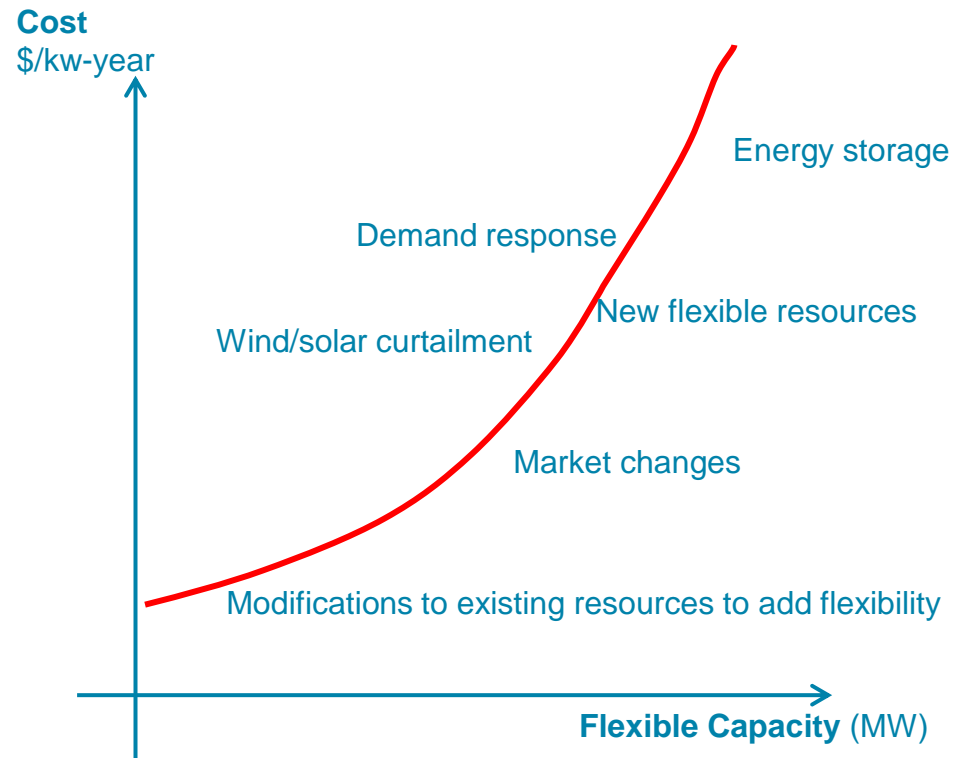


# A Cost-Effectiveness Framework Is Needed for Operating Flexibility

Once the amount and type of operating flexibility is determined (up vs. down; fast vs. slow response),

- Select the lowest cost alternatives to meet flexibility need
- No need to set aside particular technologies to meet increased flexibility need

## Operating Flexibility Supply Curve





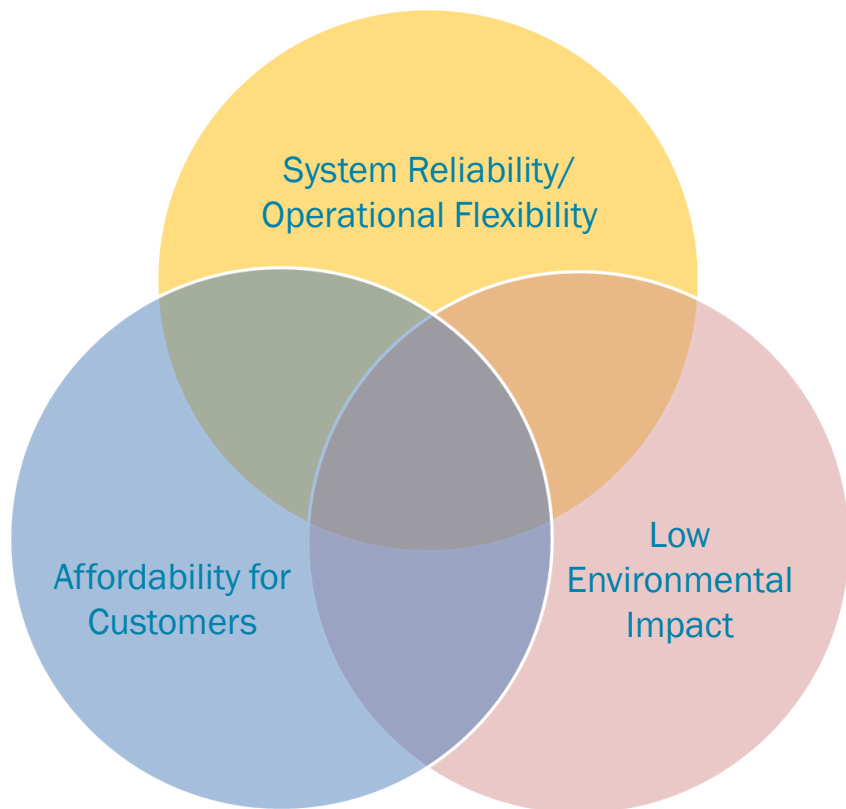
## Seek Opportunities for Cost Containment

- PG&E supports a transition to an increased reliance on market-based measures to manage costs and promote innovation in the long-run
- California cannot resolve climate change unilaterally. Formal recognition of this fact through off-ramp recommendations for any post-2020 recommendations (contingent upon lack of action outside of California) will reduce emissions leakage, signal flexibility, and help manage potential adverse California economic impacts



## California and AB 32

*California should promote energy policies that ensure a cost-effective, reliable source of energy and help reduce greenhouse gases statewide*



- ✓ Recommend using a rigorous, cross-sectoral and transparent analysis to evaluate statewide opportunities for GHG reduction.
- ✓ Promote linking with other jurisdictions to promote innovation, attract investment and expand opportunities for GHG reduction
- ✓ Transition to market-based measures; consider off-ramps contingent on load or action outside California